

Federal Defenders OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

June 28, 2023

VIA ECF

Honorable Judge Ronnie Abrams
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Foster Cooley
22 Cr. 651 (RA)

Dear Judge Abrams:

I write on behalf of my client Foster Cooley without objection from Assistant United States Attorney Andrew Chan and United States Pretrial Officer Deshawn Bostic, to respectfully request that the Court modify the conditions of the bond to remove the electronic monitoring condition and add that he is to reside at an address approved by Pretrial Services.

On December 13, 2022, Magistrate Judge James L. Cott imposed the following bail conditions: A \$100,000 personal recognizance bond to be cosigned by two financially responsible persons; travel restricted to the Southern and Eastern Districts of New York, the District of Arizona and travel therein to attend court appearances; location monitoring as directed by Pretrial Services; Drug Testing/Treatment and Mental Health Evaluation/Treatment as directed by pretrial services; No new bank accounts, lines of credit, or loans without prior approval from Pretrial Services; No possession of identification in the names of others; Third party custody of his mother; No access to a computer or internet without a monitoring program being installed; and surrender of travel documents with no new applications.

In the past seven months, Foster has remained compliant with these conditions. Given his compliance, the defense is requesting that the bond be modified to remove the electronic monitoring. Neither the Government nor Pretrial Services object to this modification.

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Thank you for your consideration of this request.

Respectfully submitted,

/s/ *Marisa K. Cabrera*

Marisa K. Cabrera
Assistant Federal Defender
Tel.: (212) 417-8730

SO ORDERED:



HONORABLE Ronnie Abrams
United States District Judge
June 28, 2023

cc: Andrew Chan, Esq., Assistant United States Attorney
Dayshawn Bostic, Pretrial Services Officer